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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**SACRAMENTO DIVISION**

BARBARA L. BONKOFSKY,	)	Case No.: 2:23-cv-02690-AC
Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del> ORDER
vs.	)	FOR AN EXTENSION OF TIME
COMMISSIONER OF SOCIAL SECURITY,	)	
Defendant.	)	

Pending the Court's approval, the parties hereby stipulate that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended twenty-eight (28) days from April 1, 2024, up to and including April 29, 2024.

This is Defendant's first request for an extension, and it is made with good cause. This is Defendant's first request for an extension, and it is made with good cause. This case was recently reassigned to undersigned counsel for Defendant, along with two other briefs, all of which are due in the first week of April 2024. Moreover, counsel now has five briefs due in the first half of April, in addition to other litigation deadlines that month. Thus, Defendant

requires an extension in this case, and may require extensions in other cases, and requests this extension in good faith and with no intent to delay these proceedings unnecessarily.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: March 8, 2024

/s/ John David Metsker\*  
(\*as authorized via e-mail on March 8, 2024)  
JOHN DAVID METSKER  
Attorney for Plaintiff

Dated: March 8, 2024

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By: /s/ Mary Tsai  
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Attorneys for Defendant

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including April 29, 2024, to respond to Plaintiff's Motion for Summary Judgment.

DATED: March 11, 2024

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE